



370 Lexington Avenue, Suite 1101

New York, NY 10017

Tel (646) 560-3224

Fax (207) 421-9215

Yann Geron

ygeron@geronlegaladvisors.com

geronlegaladvisors.com

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VIA EMAIL AND ELECTRONIC FILING (MG.CHAMBERS@NYSB.USCOURTS.GOV)

The Honorable Martin Glenn
Chief United States Bankruptcy Judge
United States Bankruptcy Court
One Bowling Green
New York, NY 10004-1408

Re: Madhu Grover, Debtor; Case No. 22-11730-mg

Your Honor:

I am serving as the chapter 7 trustee of the bankruptcy estate of Madhu Grover (the “Debtor”), the above-referenced debtor. Following your instructions at the hearing held on August 31, 2023, my counsel reached out to Ms. Ashna Shah Grover to attempt to schedule a mutually convenient date and time for her adjourned deposition, which was originally scheduled for June 15, 2023. We offered to schedule Ms. Shah Grover’s deposition during the weeks of September 18 or September 28, 2023.

Ms. Shah Grover responded by email, a copy of which is enclosed, alleging that she is doing volunteer work in remote villages around Dharamshala and will not have stable internet access until November 2, 2023. She further responded that the deposition would have to start at 10am IST (9.5 hours ahead of EST), which translates to offering to start her deposition at 12:30 a.m. Eastern.

I submit that this does not constitute a good faith effort by Ms. Shah Grover to reschedule her deposition: first because it seeks an unrealistic delay and an unrealistic start time, and second because it directly contradicts her statement on the record at the hearing that she anticipates returning to the United States in the next few weeks.

As noted at the hearing, the discharge objection deadline in this case currently expires on October 4, 2023. In light of the continued delays in this case, including Ms. Shah Grover’s email, I sought a consensual extension of this deadline from the Debtor. The debtor refused to grant me a further consensual extension. Therefore, I will be compelled to file a motion further extending the time for me and the United States Trustee to object to the Debtor’s discharge before the current deadline expires on October 4, 2023.

In light of the above, I respectfully request that the Court schedule a conference to consider our efforts at scheduling Ms. Shah Grover's deposition, and to allow me leave to make a motion to exclude Ms. Shah Grover's testimony from this case in the event she does not appear at the requested conference or at her forthcoming scheduled deposition.

I regret burdening the Court with this request but see no alternative in light of Ms. Shah Grover's continued delay tactics and the Debtor's conduct.

If the Court grants the requested conference, we will advise all parties by email as in prior events in this case.

Respectfully submitted,

s/ Yann Geron

Yann Geron

cc (via email):

Diane Bradshaw, Esq.
Ms. Madhu Grover
Nicole N. Santucci, Esq.
Ms. Ashna Shah Grover
Mark Silver, Esq.
Adrienne Woods, Esq.